



Obiamaka P. Madubuko
Tel 212.801.2195
Fax 212.805.9215
madubukoo@gtlaw.com

October 15, 2019

VIA ECF

The Honorable J. Paul Oetken
United States District Judge
Thurgood Marshall United States
Courthouse
40 Foley Square, Courtroom 706
New York, New York 10007

Re: *Levin v. The Bank of New York Mellon, et al.*, No. 09-cv-5900 (JPO)(RLE)

Dear Judge Oetken:

The parties write jointly to request a telephonic conference with your Honor to discuss and seek the Court's guidance regarding the mechanics of a potential settlement of the above-captioned action. The parties could be available on Monday, October 21, 2019 (any time after 12:00 pm EST), or on Wednesday, October 23, 2019 (any time between 3:00 – 5:00 EST), if the Court is available. If these times do not work, would the Court please give us some other days and times that would work next week?

As stated in the parties' joint letter of September 27, 2019, if settlement negotiations are unsuccessful, Alico Lebanon reserves the right to request a further extension of expert discovery in order to depose David H. Paige, and the Levins have agreed to make Mr. Paige available for a deposition in such circumstance.

Respectfully Submitted,

HOWARTH & SMITH

By: /s/ Suzelle M. Smith
Suzelle M. Smith
523 West Sixth Street, Suite 728
Los Angeles, California 90014
(213) 955-9400
ssmith@howarth-smith.com

*Attorneys for Plaintiffs Jeremy Levin and Dr.
Lucille Levin*

GREENBERG TRAURIG, LLP

By: /s/ Obiamaka P. Madubuko
Obiamaka P. Madubuko
200 Park Avenue
New York, New York 10166
(212) 801-9200
madubukoo@gtlaw.com

*Attorneys for Third-Party Defendant
American Life Insurance Company – Lebanon
Branch*

KATSKY KORINS, LLP

By: /s/ Steven B. Feigenbaum

Steven B. Feigenbaum

605 Third Avenue

New York, New York 10158

(212) 953-6000

sfeigenbaum@katskykorins.com

Attorneys for Defendant/Third-Party Plaintiff

JPMorgan Chase Bank, N.A.